

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

KINGSLEY R. CHIN and
ADITYA HUMAD,

Defendants.

Criminal No. 1:21-cr-10256-IT

DEFENDANT KINGSLEY R. CHIN’S NOTICE OF APPEAL

Pursuant to the doctrine of pendent appellate jurisdiction, in light of SpineFrontier, Inc.’s Notice of Appeal (ECF No. 302), which resulted in First Circuit Case No. 25-1251 (the “Pending Appeal”), defendant Kingsley R. Chin hereby appeals to the United States Court of Appeals for the First Circuit from this Court’s March 7, 2025 Memorandum and Order (ECF No. 297) and related rulings, including the Court’s June 7, 2024 Memorandum and Order (ECF No. 179) and February 18, 2025 Memorandum and Order (ECF No. 247). Chin has significant interests in issues that are inextricably intertwined with privilege issues raised by SpineFrontier in the Pending Appeal, but unique to Chin who faces the commencement of a criminal trial on May 19, 2025. By rulings at issue of the District Court, Chin has been required to elect whether to trigger a subject matter waiver of SpineFrontier’s privilege or forego evidence or argument about certain aspects of the involvement of counsel. Without his appeal being heard with SpineFrontier’s appeal, a second trial could be necessary in his matter after its completion because of rulings reached in SpineFrontier’s appeal.

Respectfully submitted,

/s/ Joshua L. Solomon

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March 21, 2025

CERTIFICATE OF SERVICE

The undersigned certifies that this document, filed through the ECF system, will be electronically served on counsel who are registered users of ECF on March 21, 2025.

/s/ Joshua L. Solomon